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Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE  
NORTHERN MARIANA ISLANDS

ZHAI LAN JIANG,

Plaintiff,

vs.

HAN NAM CORPORATION, a Commonwealth of  
the Northern Mariana Islands corporation,

Defendant.

CASE NO. CV 07-0035

PLAINTIFF'S  
CASE MANAGEMENT CONFERENCE  
STATEMENT

Date: Friday, January 4, 2008

Time: 10:30 a.m.

Judge: Hon. Alex R. Munson, Chief Judge

COMES NOW, Plaintiff ZHAI LAN JIANG, by and through her attorney, pursuant to LR 16.2CJ(e)(2) with her Case Management Conference Statement:

**A. Service of process on parties not yet served**

Defendant has been served and has answered Plaintiff's Verified Complaint. There are no additional parties to be served.

**B. Jurisdiction and Venue**

1. This Court has jurisdiction over Plaintiff's claims pursuant to 42 U.S.C. § 2000e-5 and 42 U.S.C. § 1981a(a)(1).

2. The Court also has jurisdiction over this matter pursuant to 28 U.S.C. § 1331 (federal question jurisdiction), 28 U.S.C. § 1337(a) (proceedings arising under any Act of Congress regulating commerce).

1           3. This Court has personal jurisdiction over Defendant as Defendant has filed a general  
2 appearance in this matter.

3           4. Venue is properly placed in this Court as at all times relevant to Plaintiff's claims herein,  
4 Plaintiff was employed by Defendant in Saipan, Commonwealth of the Northern Mariana Islands  
5 ("CNMI") and the CNMI is the jurisdiction in which the unlawful employment practices of  
6 Defendant occurred. *See* 42 U.S.C. § 2000e-5(f)(3).

7 **C. Track assignment**

8           Plaintiff agrees with the Court's recommendation of a Standard Track assignment.

9 **REASONS:**

10           There are relatively few issues in this case, no real unsettled issues of law, but the number of  
11 fact witnesses and the anticipated scope of discovery suggest more than an expedited track  
12 assignment.

13 **D. Anticipated motions**

- 14           1. Motion to Strike Affirmative Defenses;  
15           2. Various Discovery Motions;  
16           3. Motion for Summary Judgment;  
17           4. Motions *In Limine*.

18 **E. Discovery**

19 **Anticipated discovery:**

- 20           1. Interrogatories to and from Defendant;  
21           2. Requests for production of documents to and from Defendant;  
22           3. Requests for Admissions to and from Defendant;  
23           4. Depositions: Plaintiff tentatively anticipates that she will depose the following  
24 individuals and entities:  
25               a. Han Nam Corporation pursuant to Rule 30(b)(6);  
26               b. Mr. Park;  
27

- c. Mrs. Park;
- d. Ms. Song;
- e. Other fact witnesses identified by Defendant in its initial disclosures; and
- f. Other fact witnesses identified by Defendant through discovery.

**Limitations on discovery:** None.

**F. Further proceedings**

See Section K below.

**G. Special procedures.**

No special procedures are anticipated at this time.

**H. Modifications of standard pre-trial procedures.**

No modification is requested at this time.

**I. Settlement prospects**

There have been no discussions regarding settlement of this case after conclusion of EEOC proceedings; however, Plaintiff remains hopeful that a successful non-trial disposition of this matter can be reached.

**J. Other matters**

ISSUES: [very generalized and not intended to limit or define Plaintiff's issues trial].

1. Determination of the actual reason(s) for Defendant's termination/non-renewal of Plaintiff's employment with Defendant.

2. Determination of Plaintiff's compensatory damages.

**K. Setting of dates**

1. Joinder of all parties: April 18, 2008
2. Motions to amend: April 18, 2008
3. Discovery service cut-off: August 1, 2008
4. Status/settlement conference: August 1, 2008
5. Discovery motions cut-off date: September 12, 2008
6. Dispositive motions hearing date: October 30, 2008

- 1 7. Status/settlement conference: October 31, 2008
- 2 8. Joint pretrial order: December 1, 2008
- 3 9. Final pretrial conference: December 5, 2008
- 4 10. Trial: December 15, 2008

5 DATED this 2<sup>nd</sup> day of January, 2008.

7 /s/ Mark B. Hanson

8 MARK B. HANSON

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16 Attorney for Plaintiff

CERTIFICATE OF SERVICE

I certify that the following were served with a copy of the foregoing via the Court's Case Management/Electronic Case Filing system (CM/ECF):

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DATED: January 2, 2008

/s/ Mark B. Hanson

MARK B. HANSON